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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

**RICHARD BEATTY and
PATRICIA BEATTY
Debtors**

**Chapter 13 Bankruptcy
Case No. 15-29559-MBK**

**CERTIFICATION IN SUPPORT
OF MOTION TO ALLOW
LATE FILE OF CLAIM**

I, Richard Beatty, of full age, do hereby certify that:

1. I am the Debtor in the above matter and I make this Certification in support of my Motion to Allow Late Filed Proof of Claim.

2. On October 16, 2015, I filed for relief under Chapter 13 of the Bankruptcy Code. This matter is docketed under docket number 15-29559-MBK.

3. The 341A Meeting of Creditors was held on December 10, 2015. On February 9, 2016 I was able to confirm a Plan of payments.

4. As part of my Chapter 13 case, I have indicated that the Newlands Asset Holding Trust was owed overdue mortgage payments with a claim of approximately \$82,161.58.

5. On February 18, 2016, Newlands Asset Holding Trust filed a Proof of Claim that appears in the Claims Register as Claim #4-1. This Proof of claim was filed one (1) day after the Claims Bar Date of February 17, 2016. This claim was also less than I had expected and Newlands Asset Holding Trust filed their Proof of Claim with a value of \$69,276.96.

6. Although the Proof of Claim was technically a late filed Proof of Claim, it is consistent with my Modified Chapter 13 Plan After Confirmation that was filed on April 28, 2016. A Confirmation Hearing has been scheduled for this Modified Plan After Confirmation for June 14, 2016 at 10:00 a.m. This is a debt that I have always intended to pay. More importantly, the payment of this debt is the main reason for the filing of my Chapter 13 Bankruptcy Case.

7. I respectfully request that this Proof of Claim be allowed and authorized and that the Trustee be directed to pay the secured Proof of Claim as scheduled.

9. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 18, 2016

/s/ Richard Beatty
Richard Beatty, Debtor